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September 16, 2022

VIA ECF

The Honorable Douglas E. Arpert
United State District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Gustavo Martínez v. City of Asbury Park et al.*, No. 3:20-cv-08710-AET-DEA

Dear Judge Arpert:

We serve as counsel for Plaintiff Gustavo Martínez in the above-captioned matter (the “Action”). We write jointly on behalf of all parties to provide a joint status report and respectfully request that the Court provide the parties an additional 60 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then.

On January 11, 2022, the parties reached a settlement agreement in principle at a settlement conference before Your Honor. The current deadline for the parties to submit papers resolving the Action or providing a joint status report is today, September 16, 2022.

After our August 17, 2022, status conference with Your Honor, counsel for Plaintiff and counsel for the Asbury Park Defendants exchanged additional drafts of the settlement agreement and resolved the remaining two issues in contention that we mentioned to Your Honor at the Status Conference. The next step will be for counsel for the municipal defendants to provide the proposed settlement agreement to their clients for approval, and Counsel for the Asbury Park Defendants will have to do the same for the four individual defendants, who will now be signatories to the proposed settlement agreement.

To provide the necessary time to accomplish these additional steps, the parties respectfully request that the Court grant the parties an additional 60 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then. All parties consent to this joint request.

Respectfully submitted,

/s/ *Stephanie L. Silvano*

cc: All counsel of Record (via ECF)